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Public Retirement System and the Class*

[Additional Counsel Appear on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

JONNIE HOMYK, et al.,

Plaintiffs,

v.

CHEMOCENTRYX, INC. et al.,

Defendants.

Master File No. 4:21-cv-03343-JST *and
related case*, No. 4:21-cv-04357

**LEAD PLAINTIFF'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIALS SHOULD BE
SEALED**

Hearing Date: July 31, 2025

Time: 2:00 p.m.

Judge: Honorable Jon S. Tigar

1 PLEASE TAKE NOTICE that in accordance with Civil Local Rules 79-5(f) and 7-11
2 Lead Plaintiff Indiana Public Retirement System (“Lead Plaintiff”) provisionally files under seal
3 Lead Plaintiff’s Opposition to Defendants’ Cross-Motion for Summary Judgment and Lead
4 Plaintiff’s Reply in Support of Motion for Partial Summary Judgment (“Opposition”). The
5 Protective Order (ECF No. 69) provides that Lead Plaintiff must provisionally file the
6 Opposition under seal, as it quotes and references materials that Defendants have designated
7 “Confidential” and argue require sealing.

8 While obligated to file the Opposition provisionally under seal under the Protective
9 Order, Lead Plaintiff believes that the Opposition does not contain information warranting
10 sealing. *See* Civil L.R. 79-5(e) (“Only in rare circumstances should a party seek to file portions
11 of a pleading or brief under seal.”). Furthermore, that information referenced in the Opposition
12 may have been previously sealed by the Court at an earlier stage of the proceeding is
13 inconsequential, as both Your Honor and the Ninth Circuit have explained. *See In re Twitter Inc.*
14 *Secs. Litig.*, 2020 WL 14042881, at *2 (N.D. Cal. June 16, 2020) (quoting *Kamakana v. City &*
15 *Cnty. of Honolulu*, 447 F.3d 1172, 1178-79 (9th Cir. 2006)) (“The ‘compelling reasons’ standard
16 is invoked even if the dispositive motion, or its attachments, were previously filed under seal,”
17 and “the prior sealing of this information is of minimal significance.”).

18 “The compelling reasons standard is demanding and potential harm to business or
19 litigation strategies is not enough.” *Scholz-Gross v. Starbucks Corp.*, 2019 WL 13201909, at *2
20 (N.D. Cal. Feb. 8, 2019). As this Court has stressed, “‘broad allegations of harm, unsubstantiated
21 by specific examples or articulated reasoning,’ do not even satisfy the lower ‘good cause’
22 standard.” *In re Twitter Inc. Sec. Litig.*, 2020 WL 2519888, at *2 (N.D. Cal. May 18, 2020).
23 Moreover, “[t]he mere fact that the production of records may lead to a litigant’s embarrassment,
24 incrimination, or exposure to further litigation will not, without more, compel the court to seal its
25 records.” *Kamakana*, 447 F.3d at 1179. And “conclusory offerings [in support of sealing] do not
26 rise to the level of ‘compelling reasons’ sufficiently specific to bar the public access to the
27 documents.” *Id.* at 1182, 1184 (requiring a specific compelling reason for each redaction rather
28 than “a general category of privilege”).

“Additionally, because of the peculiar posture of class actions whereby some members of the public are also parties to the class action . . . the test for overriding the right of access should be applied in this case with particular strictness.” *In re Cendant Corp.*, 260 F.3d 183, 194 (3d Cir. 2001); *see also Marsh v. First Bank of Del.*, 2014 WL 117086, at *1 (N.D. Cal. Jan. 13, 2014) (“In a class action, the public right of access to court documents is especially heightened.”).

The Sealed Exhibits refers to or contains material designated “Confidential” by Defendants. The Protective Order (ECF No. 69) provides that, under these circumstances, Lead Plaintiff must file under seal at this time the following documents:

1. Lead Plaintiff’s Opposition to Defendants’ Cross-Motion for Summary Judgment and Lead Plaintiff’s Reply in Support of Motion for Partial Summary Judgment, which quotes and refers to the Sealed Exhibits;

2. Declaration in Support of Lead Plaintiff’s Opposition to Defendants’ Cross-Motion for Summary Judgment and Lead Plaintiff’s Reply In Support of Motion for Partial Summary Judgment, which quotes and refers to **Exhibits 38-88, 90-125, 127-132, 135-142, 144, 146-181, and 183**;

3. Lead Plaintiff’s Opposition to Defendants’ Request for Judicial Notice, which quotes and refers to the Sealed Exhibits;

4. **Exhibit 38**: a document produced by Defendant ChemoCentryx, bearing Bates Numbers CCXI-0000348432-34.

5. **Exhibit 39**: a document produced by Defendant ChemoCentryx, bearing Bates Numbers CCXI-0000288224-26.

6. **Exhibit 40**: a document produced by Defendant ChemoCentryx, bearing Bates Numbers CCXI-0000349022-26.

7. **Exhibit 41**: a document produced by Defendant ChemoCentryx, bearing Bates Numbers CCXI-0002696752-54.

8. **Exhibit 42**: a document produced by Defendant ChemoCentryx, bearing Bates Numbers CCXI-0000422432-34.

1 9. **Exhibit 43:** a document produced by Defendant ChemoCentryx, bearing Bates
2 Numbers CCXI-0000310038-45.

3 10. **Exhibit 44:** a document produced by Defendant ChemoCentryx, bearing Bates
4 Number CCXI-0005342010.

5 11. **Exhibit 45:** a document produced by Defendant ChemoCentryx, bearing Bates
6 Numbers CCXI-0005481442-43.

7 12. **Exhibit 46:** a document produced by Defendant ChemoCentryx, bearing Bates
8 Numbers CCXI-0002278593-97.

9 13. **Exhibit 47:** a document produced by third party Chao Wang, bearing Bates
10 Number USDC_0000000253.

11 14. **Exhibit 48:** a document produced by Defendant ChemoCentryx, bearing Bates
12 Numbers CCXI-0001670438-41.

13 15. **Exhibit 49:** a document produced by Defendant ChemoCentryx, bearing Bates
14 Numbers CCXI-0005481449-52.

15 16. **Exhibit 50:** a document produced by Defendant ChemoCentryx, bearing Bates
16 Numbers CCXI-0000952208-09.

17 17. **Exhibit 51:** a document produced by Defendant ChemoCentryx, bearing Bates
18 Numbers CCXI-0000368851-52.

19 18. **Exhibit 52:** a document produced by Defendant ChemoCentryx, bearing Bates
20 Numbers CCXI-0005668906-07.

21 19. **Exhibit 53:** a document produced by Defendant ChemoCentryx, bearing Bates
22 Numbers CCXI-0001532653-55.

23 20. **Exhibit 54:** a document produced by third party Dr. Richard Glassock, bearing
24 Bates Numbers CCX_GLASSOCK0002419-21.

25 21. **Exhibit 55:** a document produced by Defendant ChemoCentryx, bearing Bates
26 Numbers CCXI-0005601104-07.

27 22. **Exhibit 56:** a document produced by Defendant ChemoCentryx, bearing Bates
28 Numbers CCXI-0001797555-57.

23. **Exhibit 57:** a document produced by Defendant ChemoCentryx, bearing Bates Numbers CCXI-0000952205-07.

24. **Exhibit 58:** a document produced by Defendant ChemoCentryx, bearing Bates Number CCXI-0005405874.

25. **Exhibit 59:** a document produced by Defendant ChemoCentryx, bearing Bates Numbers CCXI-0001783140-54.

26. **Exhibit 60:** a document produced by Defendant ChemoCentryx, bearing Bates Number CCXI-0001909652.

27. **Exhibit 61:** a document produced by Defendant ChemoCentryx, bearing Bates Numbers CCXI-0001855277-78.

28. **Exhibit 62:** a document produced by third party Richard Glassock, bearing Bates Number CCX_GLASSOCK0002520.

29. **Exhibit 63:** a document produced by Defendant ChemoCentryx, bearing Bates Number CCXI-0007026450.

30. **Exhibit 64:** a document produced by Defendant ChemoCentryx, bearing Bates Numbers CCXI-0000400630-65.

31. **Exhibit 65:** excerpts of the transcript of the April 24, 2024 deposition of Dr. Catherine “Cass” Lee Kelleher.

32. **Exhibit 66:** a document produced by Defendant ChemoCentryx, bearing Bates Numbers CCXI-0001832841-65.

33. **Exhibit 67:** a document produced by Defendant ChemoCentryx, bearing Bates Numbers CCXI-0000304018-79.

34. **Exhibit 68:** a document produced by Defendant ChemoCentryx, bearing Bates Numbers CCXI-0002683078-132.

35. **Exhibit 69:** a document produced by Defendant ChemoCentryx, bearing Bates Numbers CCXI-0000365248-305.

36. **Exhibit 70:** a document produced by the FDA, bearing Bates Numbers FDACDER004102-08.

1 37. **Exhibit 71:** a document produced by Defendant ChemoCentryx, bearing Bates
2 Numbers CCXI-0000009558-86.

3 38. **Exhibit 72:** a document produced by the FDA, bearing Bates Numbers
4 FDACDER003039-52.

5 39. **Exhibit 73:** a document produced by Defendant ChemoCentryx, bearing Bates
6 Numbers CCXI-0000783973-81.

7 40. **Exhibit 74:** a document produced by Defendant ChemoCentryx, bearing Bates
8 Numbers CCXI-0000364674-77.

9 41. **Exhibit 75:** a document produced by Defendant ChemoCentryx, bearing Bates
10 Numbers CCXI-0000330787-92.

11 42. **Exhibit 76:** a document produced by the FDA, bearing Bates Numbers
12 FDACDER004175-209.

13 43. **Exhibit 77:** a document produced by Defendant ChemoCentryx, bearing Bates
14 Numbers CCXI-0000364721-53.

15 44. **Exhibit 78:** a document produced by Defendant ChemoCentryx, bearing Bates
16 Number CCXI-0007026547.

17 45. **Exhibit 79:** a document produced by Defendant ChemoCentryx, bearing Bates
18 Number CCXI-0007026548.

19 46. **Exhibit 80:** a document produced by Defendant ChemoCentryx, bearing Bates
20 Number CCXI-0007001050.

21 47. **Exhibit 81:** a document produced by Defendant ChemoCentryx, bearing Bates
22 Numbers CCXI-0001676567-69.

23 48. **Exhibit 82:** a document produced by Defendant ChemoCentryx, bearing Bates
24 Numbers CCXI-0002230308-10.

25 49. **Exhibit 83:** a document produced by Defendant ChemoCentryx, bearing Bates
26 Numbers CCXI-0005979097-233.

27 50. **Exhibit 84:** a document produced by Defendant ChemoCentryx, bearing Bates
28 Numbers CCXI-0001163671-72.

1 51. **Exhibit 85:** a document produced by Defendant ChemoCentryx, bearing Bates
2 Numbers CCXI-0001765701-02.

3 52. **Exhibit 86:** a document produced by Defendant ChemoCentryx, bearing Bates
4 Numbers CCXI-0005566961-66.

5 53. **Exhibit 87:** a document produced by Defendant ChemoCentryx, bearing Bates
6 Numbers CCXI-0000784540-43.

7 54. **Exhibit 88:** a document produced by Defendant ChemoCentryx, bearing Bates
8 Numbers CCXI-0002264568-70.

9 55. **Exhibit 90:** a document produced by Defendant ChemoCentryx, bearing Bates
10 Numbers CCXI-0000369579-80.

11 56. **Exhibit 91:** a document produced by Defendant ChemoCentryx, bearing Bates
12 Numbers CCXI-0000785052-63.

13 57. **Exhibit 92:** a document produced by Defendant ChemoCentryx, bearing Bates
14 Numbers CCXI-0001232913-16.

15 58. **Exhibit 93:** a document produced by third party Richard Glassock, bearing Bates
16 Number CCX_GLASSOCK0002529.

17 59. **Exhibit 94:** a document produced by Defendant ChemoCentryx, bearing Bates
18 Numbers CCXI-0004098253-55.

19 60. **Exhibit 95:** a document produced by Defendant ChemoCentryx, bearing Bates
20 Numbers CCXI-0001664151-69.

21 61. **Exhibit 96:** a document produced by Defendant ChemoCentryx, bearing Bates
22 Number CCXI-0001532253.

23 62. **Exhibit 97:** a document produced by Defendant ChemoCentryx, bearing Bates
24 Numbers CCXI-0001131695-724.

25 63. **Exhibit 98:** a document produced by Defendant ChemoCentryx, bearing Bates
26 Numbers CCXI-0002263403-09.

27 64. **Exhibit 99:** a document produced by Defendant ChemoCentryx, bearing Bates
28 Numbers CCXI-0000342311-14.

65. **Exhibit 100:** a document produced by Defendant ChemoCentryx, bearing Bates Number CCXI-0001163669.

66. **Exhibit 101:** a document produced by Defendant ChemoCentryx, bearing Bates Numbers CCXI-0005762282-84.

67. **Exhibit 102:** a document produced by Defendant ChemoCentryx, bearing Bates Numbers CCXI-0005482441-43.

68. **Exhibit 103:** a document produced by Defendant ChemoCentryx, bearing Bates Numbers CCXI-0001646079-154.

69. **Exhibit 104:** a document produced by Defendant ChemoCentryx, bearing Bates Numbers CCXI-0000551414-22.

70. **Exhibit 105:** a document produced by Defendant ChemoCentryx, bearing Bates Numbers CCXI-0002788692-238.

71. **Exhibit 106:** a document produced by Defendant ChemoCentryx, bearing Bates Numbers CCXI-0000551438-40.

72. **Exhibit 107:** a document produced by Defendant ChemoCentryx, bearing Bates Numbers CCXI-0006176116-18.

73. **Exhibit 108:** a document produced by Defendant ChemoCentryx, bearing Bates Numbers CCXI-0001977877-78.

74. **Exhibit 109:** a document produced by Defendant ChemoCentryx, bearing Bates Numbers CCXI-0001932904-06.

75. **Exhibit 110:** a document produced by Defendant ChemoCentryx, bearing Bates Numbers CCXI-0001702942-95.

76. **Exhibit 111:** a document produced by Defendant ChemoCentryx, bearing Bates Numbers CCXI-0001702939-41.

77. **Exhibit 112:** a document produced by Defendant ChemoCentryx, bearing Bates Numbers CCXI-0004376412-546.

78. **Exhibit 113:** a document produced by the FDA, bearing Bates Numbers FDACDER002141-79.

1 79. **Exhibit 114:** a document produced by Defendant ChemoCentryx, bearing Bates
2 Numbers CCXI-0005482973-76.

3 80. **Exhibit 115:** a document produced by Defendant ChemoCentryx, bearing Bates
4 Numbers CCXI-0006976983-90.

5 81. **Exhibit 116:** a document produced by Defendant ChemoCentryx, bearing Bates
6 Numbers CCXI-0002768645-46.

7 82. **Exhibit 117:** a document produced by Defendant ChemoCentryx, bearing Bates
8 Numbers CCXI-0004208124-45.

9 83. **Exhibit 118:** a compilation of documents produced by Defendant ChemoCentryx.

10 84. **Exhibit 119:** a document produced by third party Petrus Bekker, bearing Bates
11 Numbers BEKKER-0000000065-66.

12 85. **Exhibit 120:** a document produced by Defendant ChemoCentryx, bearing Bates
13 Numbers CCXI-0006970421-35.

14 86. **Exhibit 121:** a document produced by Defendant ChemoCentryx, bearing Bates
15 Numbers CCXI-0000376437-49.

16 87. **Exhibit 122:** a document produced by Amgen, bearing Bates Numbers
17 AMG10947-0000003438-40.

18 88. **Exhibit 123:** a document produced by Amgen, bearing Bates Numbers
19 AMG10947-0000010174-76.

20 89. **Exhibit 124:** a document produced by Defendant ChemoCentryx, bearing Bates
21 Numbers CCXI-0000229685, CCXI-0000229701-113.

22 90. **Exhibit 125:** a document produced by Defendant ChemoCentryx, bearing Bates
23 Numbers CCXI-0000223258-61.

24 91. **Exhibit 127:** a document produced by Defendant ChemoCentryx, bearing Bates
25 Numbers CCXI-0000489573-81.

26 92. **Exhibit 128:** a document produced by Defendant ChemoCentryx, bearing Bates
27 Numbers CCXI-0000562441-43.
28

1 93. **Exhibit 129:** a document produced by Defendant ChemoCentryx, bearing Bates
2 Number CCXI-0006176129.

3 94. **Exhibit 130:** a document produced by Defendant ChemoCentryx, bearing Bates
4 Numbers CCXI-0000340304-41.

5 95. **Exhibit 131:** a document produced by third party Burns McClellan, bearing Bates
6 Number BM_0000004693.

7 96. **Exhibit 132:** a document produced by Defendant ChemoCentryx, bearing Bates
8 Numbers CCXI-0004616410-18.

9 97. **Exhibit 135:** a document produced by Defendant ChemoCentryx, bearing Bates
10 Numbers CCXI-0003065083-87.

11 98. **Exhibit 136:** a document produced by Defendant ChemoCentryx, bearing Bates
12 Numbers CCXI-0007549364-65.

13 99. **Exhibit 137:** a document produced by Defendant ChemoCentryx, bearing Bates
14 Numbers CCXI-0002557626-34.

15 100. **Exhibit 138:** a document produced by Defendant ChemoCentryx, bearing Bates
16 Numbers CCXI-0000288282-83.

17 101. **Exhibit 139:** a document produced by Defendant ChemoCentryx, bearing Bates
18 Numbers CCXI-0000446549-52.

19 102. **Exhibit 140:** a document produced by Defendant ChemoCentryx, bearing Bates
20 Numbers CCXI-0004668212-13.

21 103. **Exhibit 141:** a document produced by Defendant ChemoCentryx, bearing Bates
22 Numbers CCXI-0000317209-16.

23 104. **Exhibit 142:** excerpts of the transcript of the July 26, 2024 deposition of Dr.
24 Petrus Bekker.

25 105. **Exhibit 144:** a document produced by third party PiperSandler, bearing Bates
26 Numbers PS014406-08.

27 106. **Exhibit 146:** an excerpt of the October 28, 2024 report of Dr. Allen Ferrell.
28

1 107. **Exhibit 147:** a document produced by Defendant ChemoCentryx, bearing Bates
2 Number CCXI-0002667069.

3 108. **Exhibit 148:** the September 25, 2024 expert report of Dr. Matthew Cain.

4 109. **Exhibit 149:** the November 25, 2024 expert report of Dr. Matthew Cain.

5 110. **Exhibit 150:** the November 25, 2024 expert report of Dr. Mark Walton.

6 111. **Exhibit 151:** the September 25, 2024 expert report of Dr. Marc Walton.

7 112. **Exhibit 152:** the September 25, 2024 expert report of Dr. Alan Bonder.

8 113. **Exhibit 153:** the November 25, 2024 expert report of Dr. Alan Bonder.

9 114. **Exhibit 154:** the November 25, 2024 expert report of Dr. Simon Helfgott.

10 115. **Exhibit 155:** the September 25, 2024 expert report of Dr. Simon Helfgott.

11 116. **Exhibit 156:** the September 25, 2024 expert report of Dr. David Madigan.

12 117. **Exhibit 157:** the November 25, 2024 expert report of Dr. David Madigan.

13 118. **Exhibit 158:** a document produced by Defendant ChemoCentryx, bearing Bates
14 Number CCXI-0000316523.

15 119. **Exhibit 159:** the sealed transcript of the April 10, 2025 hearing before this Court
16 regarding the Motions to Exclude filed by Lead Plaintiff and Defendants in this action.

17 120. **Exhibit 160:** excerpts of the transcript of the January 30, 2024 deposition of Dr.
18 David Goodkin.

19 121. **Exhibit 161:** excerpts of the transcript of the December 1, 2023 deposition of Dr.
20 Richard Glassock.

21 122. **Exhibit 162:** excerpts of the transcript of the December 15, 2023 deposition of
22 Dr. Willis Maddrey.

23 123. **Exhibit 163:** excerpts of the transcript of the December 1, 2023 deposition of Dr.
24 Richard Glassock.

25 124. **Exhibit 164:** excerpts of the transcripts of the August 30 and 31, 2024 depositions
26 of Defendant Schall.

27 125. **Exhibit 165:** excerpts of the transcript of the January 30, 2024 deposition of Dr.
28 David Goodkin.

1 126. **Exhibit 166:** excerpts of the transcript of the August 19, 2024 deposition of
2 Edward White.

3 127. **Exhibit 167:** excerpts of the transcript of the September 24, 2024 deposition of
4 Steven Seedhouse.

5 128. **Exhibit 168:** excerpts of the transcript of the December 4, 2024 deposition of Dr.
6 Frank Ferrell.

7 129. **Exhibit 169:** excerpts of the transcript of the December 15, 2023 deposition of
8 Dr. Willis Maddrey.

9 130. **Exhibit 170:** excerpts of the transcript of the March 21, 2024 deposition of Dr.
10 Jan Hillson.

11 131. **Exhibit 171:** excerpts of the transcript of the January 23, 2025 deposition of Dr.
12 Naga Chalasani.

13 132. **Exhibit 172:** a document produced by Defendant ChemoCentryx, bearing Bates
14 Numbers CCXI-0004458004-171.

15 133. **Exhibit 173:** excerpts of the transcript of the May 23, 2024 deposition of Chao
16 Wang.

17 134. **Exhibit 174:** excerpts of the transcript of the March 18, 2024 deposition of Dr.
18 David Jayne.

19 135. **Exhibit 175:** excerpts of the transcript of the August 17, 2024 deposition of Dr.
20 Peter Merkel.

21 136. **Exhibit 176:** excerpts of the transcript of the May 10, 2024 deposition of Huibin
22 Yue.

23 137. **Exhibit 177:** a document produced by Defendant ChemoCentryx, bearing Bates
24 Number CCXI-0001493178.

25 138. **Exhibit 178:** excerpts of the transcript of the July 8, 2024 deposition of Susan
26 Kanaya.

27 139. **Exhibit 179:** excerpts of the transcript of the August 7, 2024 deposition of
28 Edward Tenthoff.

140. **Exhibit 180:** excerpts of the transcript of the November 18, 2024 deposition of Dr. Steven Weisman.

141. **Exhibit 181:** a chart titled “Examples Of Information Disclosed In FDA’s May 4 Briefing Book And Information Provided To Defendants Before Or During The Class Period.”

142. **Exhibit 183:** excerpts of the transcript of the November 1, 2023 deposition of David Ferreiro.

By filing this motion, Lead Plaintiff does not concede that these materials are “confidential” or warrant remaining under seal.

DATED: June 19, 2025

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Retirement System and the Class*